

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

AMERICAN CLOTHING EXPRESS, INC.,)	
D/B/A ALLURE BRIDALS AND)	
JUSTIN ALEXANDER, INC.,)	
)	
Plaintiffs,)	Case No.: 2:20-cv-02007-SHM-dkv
)	
v.)	STIPULATION AND
)	DISMISSAL WITH PREJUDICE
CLOUDFLARE, INC. and)	
DOES 1 - 200, inclusive,)	
)	
Defendants.)	
)	

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs AMERICAN CLOTHING EXPRESS, INC., D/B/A ALLURE BRIDALS and JUSTIN ALEXANDER, INC., and Defendant BRIDE2BRIDE.CO.UK hereby:

STIPULATE AND AGREE as follows:

1. Plaintiffs voluntarily dismiss this action against BRIDE2BRIDE.CO.UK with prejudice;
2. BRIDE2BRIDE.CO.UK has not served an answer or motion for summary judgment in this case;
3. After the Complaint was filed in this case, BRIDE2BRIDE.CO.UK's owner, Staple Media Ltd., represents that BRIDE2BRIDE.CO.UK has taken the following steps to address the Plaintiffs' concerns about the repeated unauthorized appearance of their images on BRIDE2BRIDE.CO.UK: i) registered an agent to receive notifications of claimed infringement under the DMCA, ii) ensured that it had implemented measures to expeditiously remove or

disable access to material that is claimed to be infringing, and iii) adopted and reasonably implemented a policy of terminating repeat infringers in appropriate circumstances;

4. This Stipulation does not constitute any admission of liability under the Copyright Act or otherwise on the part of BRIDE2BRIDE.CO.UK, Staple Media Ltd., or Staple Media Ltd.'s director, Simon Collin;

5. This stipulation shall constitute a complete release from, and bar to, any and all claims that BRIDE2BRIDE.CO.UK, Staple Media Ltd., or Simon Collin may have against Plaintiffs in connection with this action;

6. This stipulation shall constitute a complete release from, and bar to, any and all claims that Plaintiffs may have against BRIDE2BRIDE.CO.UK, Staple Media Ltd., or Simon Collin in connection with this action; and

7. Each party will bear its own costs and attorney's fees.

June 1, 2022

Respectfully submitted,

s/ Nicole Berkowitz Riccio
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s/ Phillip R. Malone _____
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